

TO: J. Yang

DATE: 14 June 1982

1010394

FROM: H. A. Eschenbach

RE: Fiber Counting

cc: J. Danel/Enoree  
O. M. Favorito  
W. McCaig/Libby  
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SEP 8 1982

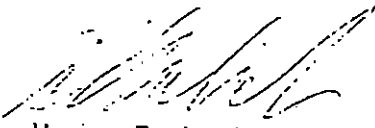
C.P.D. ENG.

In answer to your recent query about fiber counting, I am providing you with this memo which states our position, based upon discussions with NIOSH and others in the past.

When counting asbestos fibers, those particles which appear on the slide which are obviously not asbestos but some other material are not to be counted as fibers. Even if the aspect ratio and other criteria for fibers are met, non-fibrous materials are not asbestos and therefore must be excluded. This is especially important when one is evaluating fibers in an atmosphere which contains a significant amount of other contaminants.

In summary, vermiculite is not asbestos and should not be counted as such unless there is significant doubt as to the nature of the species. At that point, one would err on the safe side and count it as a fiber.

I have a feeling of deja vu -- this subject reappears every three or four years.

  
Harry Eschenbach

HAE/cs